

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA : No. 10 CR 594 (ERK)
-against- : NOTICE OF MOTION
JOSEPH YANNAI, :
Defendant. :
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S I R S O R M E S D A M E S:

PLEASE TAKE NOTICE, that upon the annexed Declaration of NEIL B. CHECKMAN, ESQ., an attorney assigned pursuant to the Criminal Justice Act to represent Mr. Joseph Yannai on the above-captioned Indictment, the undersigned will move this Court for an Order directing the Government to take whatever steps are necessary to enable the release of the \$67,000 cash bail that was posted as security for the defendant's release on the above-captioned case, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
August 15, 2013

Respectfully submitted:

/S/

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Hon. EDWARD R. KORMAN
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
LORETTA E. LYNCH, ESQ.

United States Attorney
Eastern District of New York
271 Cadman Plaza East
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By: A.U.S.A. Daniel A. Spector
A.U.S.A. Hilary L. Jager
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